

# Food Safety Modernization Act Forecast: Expectations for the First Season Under the Produce Safety Rule



**2017 Citrus Expo**

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North Fort Myers, FL**



# Produce Safety Rule

First ever mandatory federal food safety standard for growing, harvesting, packing, and holding of fresh produce (similar to T-GAPs)



# Preparing for Implementation of the Produce Safety Rule

- Timeline for coming into compliance
- What to expect after your implementation date
- What you need to do
- Workshops and Readiness Reviews



Rule	2016	2017	2018	2019	2020	2021	2022
	January 26						
Produce Safety	<u>Large</u>						
	<u>Small</u>						
	<u>Very small</u>						

Final
  Large
  Small
  V. Small
  Water

- Large businesses with greater than \$500,000 in average annual (previous three year period) produce sales, will need to comply with the regulation by January 2018.
- Small businesses, defined as greater than \$250,000 but less than \$500,000 in average annual (previous three year period) produce sales, will need to comply with the regulation by January 2019.
- Very small businesses, defined as greater than \$25,000 but less than \$250,000 in average annual (previous three year period) produce sales, will need to comply with the regulation by January 2020.
- \*Additional 2 years (at least) for water.

# Potential Citrus Exemptions

- Annual sales exemption
- Direct marketing qualified exemption
- Commercial processing



# Annual Sales Exemption

- <\$25,000 in gross total produce sales annually (3 year average)





# Qualified Exemption

- “Direct marketing exemption”
  - <\$500,000 total annual FOOD sales averaged last 3 years
- AND
- >50% direct sales





# Qualified Exemption

- Modified requirements:
  - Review sales annually and calculate 3 year average (written record: signed, dated, name/address of farm)
  - Keep a record of the last three years of sales receipts (dated)
  - Must have a label, sign, or documentation at point of sale with farm name and address

## Qualified Exemption Review *Template*

Name and address of farm: \_\_\_\_\_

Date: \_\_\_\_\_

Sales receipts or records reflecting **total food** sales over the previous 3 years:

Year 1 (Sales year: \_\_\_\_\_) \$ \_\_\_\_\_

Year 2 (Sales year: \_\_\_\_\_) \$ \_\_\_\_\_

Year 3 (Sales year: \_\_\_\_\_) \$ \_\_\_\_\_



# Commercial Processing Exemption



- If all of your fruit always goes to pasteurized juice
- “not processed to adequately reduce the presence of microorganisms of public health significance” in documents or on container
- Annual written assurance from processor



Not this



# What to expect

- Compliance begins January 2018
- FDA contracting with FDACS to conduct inspections
- Inspections not likely until late spring 2018
- “Educate before (and while) we regulate”



# What to expect

- Inspectional approach for Produce Safety Rule is early in draft phase
- From PC inspections:
  - Risk mindset (recalls, etc)
  - Determine business size
  - Have employees been trained?
  - Evaluate GMPs, not a “gotcha” list
  - Well trained inspectors, good dialogue
  - Encourage voluntary corrections for minor deficiencies that can be corrected during inspection (majority so far)
  - Few critical violations (egregious conditions)



# What you need to do

## Key Requirements

- Worker Training and Health and Hygiene
- Agricultural Water Quality
- Biological Soil Amendments
- Domesticated and Wild Animals
- Equipment, Tools and Buildings



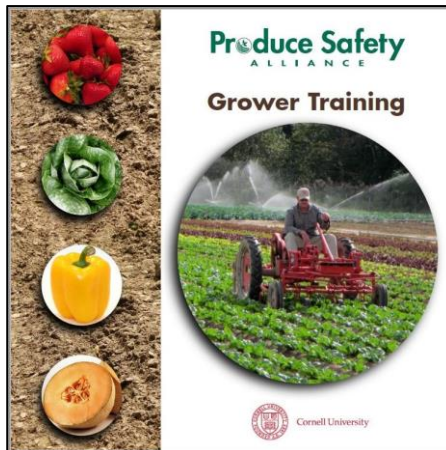
# Worker Health and Hygiene

- All employees and visitors
  - Handwashing
  - Personal cleanliness
  - No eating, gum, or tobacco in the growing or packing area
  - Don't work/visit when ill



# Supervisor Training

- At least one person from each farm trained and responsible for PSR





# Worker Training

- Principles of food safety
- Personal hygiene and recognizing symptoms of foodborne illness
- PSR requirements relevant to job duties
- Recognizing, reporting, and correcting food safety hazards (harvest workers)





# Worker Training



## Document:

- Date, topics, names
- Reviewed, dated, signed

**Worker Training Record *Template***

Name and address of farm: \_\_\_\_\_ Date: \_\_\_\_\_

Trainer: \_\_\_\_\_ Training time: \_\_\_\_\_

Topics Covered: \_\_\_\_\_

**Training materials:** Please attach any printed materials related to the training. Also reference any relevant SOPs or sections of the farm food safety plan that apply.

Employee Name (please print)	Employee Signature
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____



# Agricultural Water Quality

- Water that contacts fruit
- Sources and distribution systems reviewed and documented annually
- Microbial criteria: <126 CFU/100 ml GM and <410 CFU/100 ml STV generic *E. coli* with EPA method 1603
- MWQP: 20/5 surface; 4/1 ground



# Agricultural Water Quality

- Water that contacts fruit
- Sources and distribution systems reviewed and documented annually
- Microbial criteria:  $<126$  CFU/100 ml

**UNDER REVIEW**

- MWWQP: 20/3 surface, 4/1 ground





# Agricultural Water Quality

- Document annually:
  - Inspection of water distribution systems, facilities and equipment
    - Consider source, extent of your control, degree of protection, adjacent and nearby land, upstream hazards

**Water System Inspection Record *Template***

Name and address of farm: \_\_\_\_\_

See farm policy for specific water distribution system inspection procedures.

Date	Time	Water Source and/or Distribution System	Observations	Corrective Actions Taken	Initials
4/22/16	7:00 AM	Well 1, north field	Well casing in good shape, backflow prevention device in place, no broken pipes	None	EAB
4/22/16	9:00 AM	Pond, south field	Significant geese presence	Introduced swan decoys. Will monitor	EAB

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# Agricultural Water Quality



- Document:
  - Water treatment or test results or annual records from public water system
  - Reviewed, dated, and signed

Water Treatment Monitoring Record <i>Template</i>							
Name and address of farm: _____							
Please see the food safety plan for overall water treatment procedures.							
Date	Time	Water pH	Water Temperature	Turbidity	Sanitizer (name & rate)	Corrective Action Needed (yes or no)	Initials
10/14/16	8:35 am	8.5	65° F	25 NTU	NaOCl 75 ppm	Yes - pH was too high, added citric acid; retested - pH 7.0	EAB
10/14/16	12:00 pm	7.0	72° F	47 NTU	NaOCl 55 ppm	no	EAB



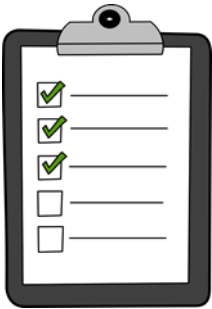
# Biological Soil Amendments of Animal Origin

- Manure, manure compost, bone meal, blood meal, feather meal, fish
- Allowable application methods and harvest intervals depend on treatment
- No additional restrictions for Class A biosolids





# Biological Soil Amendments



- If using (animal) soil amendments in a way that might contact crop during or after application, document treatment or suppliers process

**Compost Treatment Record *Template***

Name and address of farm: \_\_\_\_\_

Type of compost method: Windrow      Date piled: 9-15-2016      Date finished: \_\_\_\_\_      Row number: 2

List all ingredients added to compost: Poultry litter, kitchen scraps, dried leaves, straw

Use this record for on farm composting. Record the date piled, turning dates, and the temperatures maintained. Use one sheet for each pile or row.

Date Turned	Temp/Time Test Area 1	Temp/Time Test Area 2	Temp/Time Test Area 3	Temp/Time Test Area 4	Initials
9-25-2016	135 F/ 2:00 PM	138 F/2:01 PM	140 F/ 2:03 PM	135 F/ 2:04 PM	EAB
9-26-2016	137 F/ 2:15 PM	137 F/2:18 PM	138 F/ 2:19 PM	137 F/ 2:25 PM	EAB

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# Domesticated and Wild Animals

- Growing areas monitored
- Contaminated fruit not harvested



# Domesticated and Wild Animals

- Growing areas monitored
- Contaminated fruit not harvested



# Equipment, Tools, and Buildings

- Any equipment, tools, and buildings used for growing or harvesting activities (including for storage) inspected and cleaned as needed





# Equipment, tools, and buildings



- Document:
  - Date and method of cleaning and sanitizing equipment used in covered activities
  - Reviewed, dated, and signed

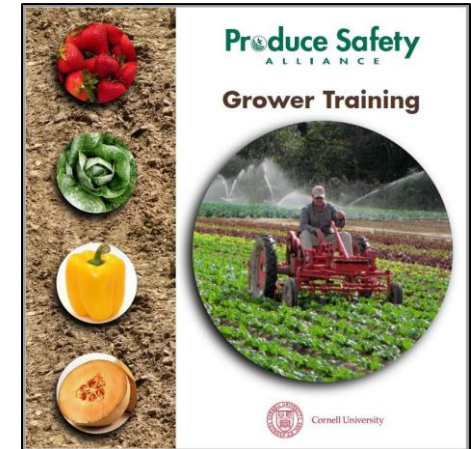
Cleaning and Sanitizing Record <i>Template</i>					
Name and address of farm: _____					
List the date, time, tool or equipment name, and method for each for each cleaning or sanitizing activity.					
Date	Time	List tools/equipment	Cleaned and/or Sanitized?	Method used	Cleaned By (initials)
10/11/16	10:07 AM	Harvest tools	cleaned	See Cleaning SOP (Removed dirt with brush, washed with detergent, rinsed, air dried)	EAB
10/11/16	10:30 AM	Dump Tank	cleaned and sanitized	See Dump Tank Cleaning and Sanitizing SOP (drained tank, washed with detergent, rinsed, sanitized with 150 ppm NaOCl)	EAB





# UF/IFAS PSA Grower Courses

- August 30<sup>th</sup> – Lake Alfred
- September 18<sup>th</sup> – Fort Pierce
- October 3<sup>rd</sup> - Homestead
- October 9<sup>th</sup> – Wauchula
- October 12<sup>th</sup> – Immokalee
- October 26<sup>th</sup> – Marianna
- November 6<sup>th</sup> – Live Oak
- November 8<sup>th</sup> – West Palm Beach
- November 13<sup>th</sup> – Balm
- November 14<sup>th</sup> – Tavares



# On-Farm Readiness Review

- Pre-inspectional food safety tools
- Overseen by NASDA
- Partnership between FDACS and UF/IFAS
- It helps match what you're doing to what's required in the rule.
- It helps you figure out what you're missing.



# Summary

- “marathon not a sprint”
- Largest farms start demonstrating compliance January 2018
- Handful of required records, depending on practices
  - [producesafetyalliance.cornell.edu](http://producesafetyalliance.cornell.edu)
- Take PSA Grower course, consider On-Farm Readiness Review





# Questions?

- UF/IFAS PSA workshops
  - [www.crec.ufl.edu/events](http://www.crec.ufl.edu/events)
  - tkchapin@ufl.edu
- Produce Safety Alliance
  - [www.producesafetyalliance.cornell.edu](http://www.producesafetyalliance.cornell.edu)
- FDA' s FSMA Website
  - <http://www.fda.gov/fsma>

